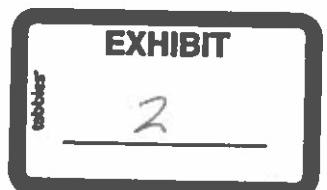


STATE OF OHIO )  
                  )  
                  )      SS  
COUNTY OF FRANKLIN )

**AFFIDAVIT OF COLIN KAIDE, M.D.**

Colin Kaide, M.D., swears and affirms the following information is true:

1. I am a physician licensed to practice medicine in the State of Ohio and am board certified in Emergency Medicine. I spend greater than 75% of my professional time in the active clinical practice of medicine and/or its teaching.
2. I have reviewed various medical records and materials regarding the care and treatment of James Geary. These include, but are not limited to, the records and imaging from the Dayton VA Medical Center.
3. I am familiar with the standards of care applicable to the care provided in this case, specifically, the treatment of a patient with severe foot pain and signs and symptoms suggestive of an evolving infection.
4. In my opinion, the care provided to James Geary by the health care providers at the Dayton VA medical Center between March 18, 2019 and March 25, 2019 was below the standard of care. This deviation directly and proximately led to damages, specifically, sepsis and the below the knee amputation of James Geary's right leg.
5. I further incorporate my opinions in this case as set forth in the report I authored, which is attached hereto as Exhibit 3.
6. This Affidavit is attached to the Complaint to satisfy Ohio Civ. R. 10(D)(2) and in no way expresses my entire opinions in this matter. I reserve the right to modify, alter or add to my opinions as Discovery ensues in this matter.



FURTHER AFFIANT SAYETH NAUGHT.



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Colin Kaide, M.D.

Sworn to and subscribed before me this 04 day of August, 2021.

